



301339

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MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley DATE: December 30, 2005

C.C.: RRG/Clayton Site Technical Committee, J. Weinberger, P.
Harvey, R. Shepherd, B. Schloessler, Filing

RE: **Status Report # 2 for the Resource Recovery Group/Clayton Chemical Company Site**

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and it's designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site, dated October 28, 2005. The reporting period for this second Monthly Status Report is December 1 through 28, 2005.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (the Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 1 was submitted to U.S. EPA on November 30, 2005.

1.0 COMPLETED ACTIVITIES

1.1 Pre-mobilization, Mobilization and Removal Activities Completed To Date

A variety of project-related tasks and activities have been completed since the delivery of the previously submitted Status Report for the RRG/Clayton Chemical Site. Among the more significant tasks and activities are:

- On December 1, 2005, Conestoga-Rovers & Associates (CRA) and Brandenburg Industrial Services Company (BISCo) met to discuss planned Site mobilization and to discuss Site operations. Among the discussed topics were the key members of the Project team, expectations for the project, and the necessary paperwork procedures

- On December 5, 2005, CRA and BISCo mobilized to the Site. OSC Turner, Superfund Technical Assistance and Response Team (START) member Thomas Binz, and Illinois Environmental Protection Agency (IEPA) Project Manager Michael Grant visited the Site, and were given an operational briefing of the planned activities for completing the Removal Action. OSC Turner and START Binz also were given a tour of the Site. Several pieces of equipment were also delivered to the Site, including a Liebherr 924 excavator/shear.
- BISCo established the primary Site Work Zones on December 5 and 6, 2005. A copy of the Site Layout Map showing these initial Work Zones is included as an attachment to the Summary of Activities report for the Week Ending December 11, 2005
- A total of 38 ASTs were demolished to varying degrees between December 6 and 28, 2005. These AST were demolished according to the following schedule: 23 ASTs during the week of December 5, 2005; 7 ASTs during the week of December 12, 2005; 7 ASTs during the week of December 19, 2005; and one AST during December 27 and 28, 2005. A total of five stainless steel vat pots and other storage vessels have also been demolished during this period

A total of 16 loads of recovered scrap steel were shipped offsite to Grossman Iron and Steel Company (Grossman) for processing. These materials were shipped as follows: 3 loads during the week of December 5, 2005; 5 loads during the week of December 12, 2005; 4 loads during the week of December 19, 2005; and 4 loads on December 27 and 28, 2005

Additionally, one load of recovered scrap stainless steel were shipped to Grossman during the week of December 12, 2005

- Asbestos removal activities on friable and non-friable asbestos containing materials (ACM) were completed in the Office/Laboratory Building (December 7 and 8, 2005), the distillation tower (December 12, 2005) and the roof of the former break trailer (December 13, 2005). These materials remain onsite awaiting offsite disposal
- Additional Removal Action demolition activities completed during the reporting period include the demolition of the former break trailer on December 13, 2005; the demolition of a pipe bridge and associated overhead piping between EZ 4 and EZ 5 on December 19, 2005; the removal of the boiler/used oil burner unit on December 21, 2005; the demolition of the three-story plastic shed and the 1-story metal shed from eastern portion of the Work Zone EZ4; the demolition of the Filtration Area 2 at the eastern portion of EZ 4; and the removal of the air compressor, as well as the associated tower and pressure vessel for the unit, from the western portion of EZ 4 on December 27, 2005. Throughout the period, an estimated 2735 lineal feet of process piping was removed and included with scrap steel shipments

Additional details of the completed activities are provided in the form of Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for December 5 – 9, 2005; Appendix B – Weekly Summary of Site Activities for December 12 – 16, 2005; Appendix C – Weekly Summary of Site Activities for December 19 – 23, 2005; and Appendix D – Weekly Summary of Site Activities for December 26 – 28, 2005. Among the notable documents included as Attachments to these Weekly Summary Reports

are the initial Site Layout Map showing the various Site Work Zones and the associated Submittal Log showing the initial draft submittal documents from BISCo to CRA (included with Appendix A)

1.2 Sampling and Analysis

During the week of December 12, 2005, personnel from Environmental Quality Industrial Services (EQIS), the sub-contractor secured by BISCo to perform waste sampling, material analysis, and waste disposal activities, collected waste characterization samples from 27 ASTs that were previously identified as containing solids/sludges. Additional details on these activities are provided in the Summary Report for that period, which is enclosed as Appendix D of this report

Analytical data from these samples are expected to be available during the week of January 3, 2006

1.3 Removal Action Work

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. The more significant of these completed actions were discussed above in Section 1.1 of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

No significant problems have been encountered during the reporting period. Additionally, no problems are anticipated for the upcoming period with the possible exception of weather related delays.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

The only samples collected during the reporting period were the 27 AST material characterization samples discussed previously. A Summary Log of these samples is included as an attachment to the Weekly Summary Report for the Week of December 12, 2005 (Appendix B of this report). The analytical results from these samples are expected to be reported during the week of January 3, 2006. As such, these data will be provided to U.S. EPA with or prior to the issuance of Status Report # 3 on January 30, 2006.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 Site Plans

During the upcoming reporting period, the following activities are anticipated:

- Tank demolition activities for the empty ASTs at the Site will be completed;
- Tank cleaning/material removal activities will be initiated for those ASTs found to contain solids and sludges in accordance with the results of the waste characterization samples;
- Waste characterization samples will be collected from the drummed materials (hazardous materials, suspected process chemicals, etc.);
- The demolition of overhead piping will continue;
- The decommissioning of process equipment located at the Site will continue;
- Asbestos abatement activities will/may be completed at the final two previously identified locations.

4.2 Sampling and Analysis

Waste Characterization sampling will be initiated for the drummed materials at the Site. These activities will primarily be focused on containers stored inside the Waste Drum Storage Building and the Boiler Building. As with the tank sampling activities, EQIS personnel will perform the sampling activities and will perform the analysis of the samples.

4.3 Removal Action Work

Among the activities expected to be performed and/or completed during the upcoming report period are the required Site preparation activities, asbestos abatement activities, drum and tank sampling activities, piping decommissioning activities, and waste characterization activities. An anticipated schedule for these activities appears below.

5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration (business days)</i>	<i>Expected Start Date</i>
Remobilization	1 day	January 3, 2006
Site Plan Development	As needed	January 3, 2006
Site Preparation	As needed	January 3, 2006
Asbestos Abatement	As needed	January 3, 2006
Waste Characterization (Drums)	40 days	January 3, 2006
Tank Sampling/ Sludge Removal	30 days	January 3, 2006
Piping Demolition	1 day	January 3, 2006
Submit Status Report # 3	1 day	January 30, 2005

Attachments: Appendix A - Weekly Summary of Site Activities for December 5 – 9, 2005
Appendix B - Weekly Summary of Site Activities for December 12 – 16, 2005
Appendix C - Weekly Summary of Site Activities for December 19 – 23, 2005
Appendix E - Weekly Summary of Site Activities for December 26 – 28, 2005

APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 5 - 9, 2005



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley DATE: December 30, 2005

C.C.: Sharon Newlon, J. Weinberger, P. Harvey, R. Shepherd, B. Schloessler, Filing

RE: Weekly Summary Of Site Activities For December 5 - 9, 2005

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the first week (the period December 5 through 9, 2005) is presented below.

Date	Tasks	Activity
December 5, 2005	Mobilization Activities	Conestoga-Rovers & Associates (CRA) and Brandenburg Industrial Service Company (BISCo) personnel mobilized to the Site. BISCo received some equipment onsite (Liebherr 924 excavator/shear, personnel decontamination trailer, generator/light stand, and a Bobcat/skid-steer loader). Additional equipment will continue to be mobilized to the Site throughout the week
	Project Coordination	OSC Kevin Turner and START Tom Binz were onsite from 11:30 to 1:00. Among the discussion points during their visit was the desire to determine containment integrity beneath the 4 used oil ASTs in the north most tank farm at the Site due to the reputation of the supplier to generate contaminated oil. Mike Grant, the Illinois Environmental Protection Agency Project Manager for the Site, also visited and was given a project briefing
	Site Preparation	BISCo began delineation of the proposed Site Work Zones using yellow "Caution" tape (Contaminant Reduction Zone - CRZ) and red "Warning" tape (Exclusion Zone - EZ) to indicate the limits of each area/sub-area
	Asbestos Abatement	No activity

Date	Tasks	Activity
December 5, 2005	AST Sampling/Cleaning Removal	No activity
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 6, 2005	Mobilization Activities	A manlift and a portable toilet were delivered to the Site
	Project Coordination	OSC Turner was contacted regarding a possible change in the office accommodations for the U.S. EPA. OSC Turner verbally approved having U.S. EPA, CRA and BISCO sharing a single office trailer
	Site Preparation	The delineation of the initially designed Work Zones was completed. Orange snow fencing was used to delineate the Support Zone (SZ) area. This initial layout was subsequently field adjusted for Site conditions and practicality. Among the modifications was the expansion of the SZ to include the Office/laboratory building following the completion of asbestos abatement activities. A Site reconnaissance/chemical sweep was completed
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	Tank demolition activities with known empty ASTs at the south end of the Site (EZ 1) with the inventorying, atmospheric screening and visual reconnaissance of these tanks. Actual demolition actions were performed on tanks T10, T5, and T6
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 7, 2005	Mobilization Activities	A second excavator with several attachments (including a bucket and a magnet), the EPA office trailer and a second generator were delivered to the Site. Overnight Site security in the form of a Security service was initiated
	Project Coordination	No activity
	Site Preparation	No activity

Date	Tasks	Activity
December 7, 2005	Asbestos Abatement	Asbestos abatement activities were started in the lab portion of the office/lab building with the removal of the countertops that were determined to be asbestos-containing material (ACM). Prior to starting ACM removal activities, the laboratory chemicals were repackaged and taken to the Waste Drum Storage Building for temporary storage
	AST Sampling/Cleaning Removal	Tank demolition activities were completed for the steel ASTs in EZ 1 with the screening and/or processing of T1 through T4, T7 through T9, T15, T16, and T18. ASTs T11 through T14 were screened for atmospheric conditions. However, they are fiberglass tanks and were not processed for recycling
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 8, 2005	Mobilization Activities	An electrician mobilized to the Site and connected the generator to the U.S. EPA trailer. This generator was later found to be defective and was later replaced
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	Asbestos abatement activities were completed in the lab portion of the office/lab building with the removal of the vent hoods
	AST Sampling/Cleaning Removal	Tank demolition activities also continued with seven ASTs (S1, and S3 through S8) from the tank farm at the northwest corner of EZ 4 being removed for processing as scrap materials. Although AST S3 was identified as containing solids during the Liquid Removal Action (LRA), it was found to be empty during a visual reconnaissance. Two (2) loads of recovered scrap steel were shipped offsite by Grossman Iron and Steel Company (Grossman) of St. Louis, Missouri for recycling
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity

Date	Tasks	Activity
December 8, 2005	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 9, 2005	Mobilization Activities	A replacement generator was delivered to the Site and connected to the U.S. EPA office trailer. Electricity service was restored to the Site by the local utility through activation of service to the Office/laboratory building. Before discontinuing use of the generator/light stand unit to supply power to the building, an electrician will test the existing wiring in the building and will install temporary wiring, if needed, for safe operation. This is expected to be completed during the week of December 12, 2005.
	Project Coordination	START Binz toured the Site and was updated on completed activities, as well as on expected upcoming actions. Among the areas included in the Site tour was a reconnaissance of the U.S. EPA office trailer
	AST Sampling/Cleaning Removal	Tank demolition activities continued with the removal of ASTs S2 and S9 from the EZ 4 northwest tank farm area. Although AST S2 was identified as containing solids during the LRA, it was found to be empty during a visual reconnaissance. 2 stainless steel vat pots were also removed from the tank farm area. A total of 23 ASTs have been cut up and/or removed for demolition since tank demolition activities were started. One load of recovered scrap steel was transported offsite by Grossman for a total of three loads of recovered materials shipped offsite for the week
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
	Asbestos Abatement	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), John Weinberger (773-419-45850, or Phil Harvey (773-380-9933) for clarification.

Attachments: Site Layout Map
Submittals Log (updated through December 6, 2005)

Brandenburg, Industrial Service Company

2625 South Loomis Street
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Brandenburg.**Submittal Packages Summary Log**

Summary Log, Sorted By Submittal Number

Sauget - Resource Recovery Group/Clayton Chemical Site Remediation								
Number	Sec. Ref	From Company	Description	Trans Number	Sent	Due	Rec'd	Days +/- Action
Need WitNeed 7 Days after Receipt of Notice to Proceed								
1	1300-5	Brandenburg	Project Schedule	1	12/2/2005		12/2/2005	0
2	1300-6	Brandenburg/EQ	Project Organization Chart	3	12/2/2005		12/2/2005	
3	1300-7	Brandenburg	Site Layout Drawing	2	12/2/2005		12/2/2005	
4	1300-8	Brandenburg	Asbestos Work Plan	6	12/2/2005		12/2/2005	
5	1300-8	Brandenburg	Submittal Log	4	12/2/2005			
6	1351	BrandenburgEQ	HASP					
7	1351	Brandenburg	Site Specific HASP					
8	1351-5	Brandenburg	Proof Of OSHA Training	8	12/2/2005		12/5/2005	need to turn in on site
8	1351-4	Brandenburg	Medical Surveillance	8	12/2/2005		12/5/2005	need to turn in on site
9	1351-4	Brandenburg	Respirator Fit Test	8	12/2/2005		12/5/2005	need to turn in on site
10	1351-9	Brandneubrg	Air Monitoring Plan					
11	1351-11	Brandenburg	Contingency/Emergency Response Plan					
12	2131-2	Brandenburg	AST Cleaning and Removal					
13	2132-4	Brandenburg	NESHAPS	5	12/2/2005		12/2/2005	
14	2132-5	Brandenburg	ACM Handling Plan	6	12/2/2005			
15	2223-1	Brandenburg	Demo Plan Process Piping					
16	2224-1	Brandenburg	Demo Plan Abovegrade Structures					
17	2317-2	Brandenburg	Excavation Plan					
Within 14 Days of Notice to Proceed								
18	1571-2	Brandenburg	SESC Plan	7	12/2/2005		12/2/2005	
19			SWPPP					
20	1571	Brandenburg	SPCC	9	12/2/2005		12/2/2005	
Prior to Task								
21	2105-2	EQ	Analytical Quality Assurance Plan					
22	2105-2	EQ	Waste Disposal Proposal					
23	2126-2	Brandenburg/EQ	Drum container/removal plan					
24								
25								
26								
Weekly Submittals								
wk1	1300-7	Brandenburg	Updated Schedule					
wk2	1300-7	Brandenburg	Copies of Analytical					
wk3	1300-7	Brandenburg	Copies of Manifests/Disposal Tickets					
wk4	1300-7	Brandenburg	Copies of Visitor Logs					
wk5	1300-7	Brandenburg	HEPA Filter Change out Log					
wk6								
wk7								
wk8								
Daily Submittals								
D1	1351-4, 10	Brandenburg	Air Monitoring Results					need form
D2	2105-5	EQ	Drum Data Sheets					
D3	2126-2	EQ	Drum Data T&D					
D4	1500	Brandenburg	Log of Wastewater in Storage Tank					
D5								

Brandenburg

APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 12 - 16, 2005



**CONESTOGA-ROVERS
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MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley DATE: December 30, 2005

C.C.: Sharon Newlon, J. Weinberger, P. Harvey, R. Shepherd, B. Schloessler, Filing

RE: Weekly Summary Of Site Activities For December 12 - 16, 2005

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the second week (the period December 12 through 16, 2005) is presented below.

Date	Tasks	Activity
December 12, 2005	Mobilization Activities	Electricity was turned on and maintained in the office building.
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	Brandenburg Industrial Service Company (BISCo) removed the tower that had an asbestos insulation wrapping. BISCo used wet methods to control the friable asbestos. The pipe, including the asbestos, was completely encapsulated in plastic sheeting and appropriately marked for pending disposal

Date	Tasks	Activity
December 12, 2005	AST Sampling/Cleaning Removal	BISCo began removal of aboveground storage tank (AST) # 20. After shearing an end off the tank, it was identified that three to four inches of dried sediments were at the bottom of this tank. The open AST was immediately covered with polyethylene sheeting to prevent any future precipitation from entering the tank. BISCo also removed AST 51. Two employees from Environmental Quality Industrial Services (EQIS) in Ypsilanti, Michigan (BISCo's hazardous waste disposal sub-contractor) were on-site throughout the week collecting samples for waste characterization purposes from the tanks noted during the Liquids Removal Action (LRA) as containing solids and/or sludges
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 13, 2005	Mobilization Activities	
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	BISCo removed the roof from the former workers' break trailer. The roof was identified in the asbestos assessment report as being a Non-Friable Category 1 asbestos containing material. As such, the roof was placed, awaiting disposal, in a roll-off box with other demolition debris from the demolition of the trailer
	AST Sampling/Cleaning Removal	EQIS continued sampling solids and sludges from the ASTs identified in the LRA as containing materials
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity


















Date	Tasks	Activity
December 14, 2005	Mobilization Activities	No activity
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	BISCo removed and demolished tanks 51, 33, 37, 18, 24, and A2 from Exclusion Zone area EZ 4. EQIS continued sampling solids and sludges from the ASTs identified in the LRA as containing materials
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 15, 2005	Mobilization Activities	
	Project Coordination	Mike Grant with the Illinois Environmental Protection Agency (IEPA) was at the Site. Mr. Grant stated he was pleased with the work and with the fact that many of the parts of the facility were being removed
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	BISCo removed and demolished tank the fuel oil tank and tank G2. BISCo also began shearing apart tank # G3. EQIS continued sampling solids and sludges from the ASTs identified in the LRA as containing materials
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 16, 2005	Mobilization Activities	
	Project Coordination	No activity
	AST Sampling/Cleaning Removal	BISCo continued with demolition of tank # G3. EQIS continued sampling solids and sludges from the ASTs identified in the LRA as containing materials. A total of 27 samples were collected and shipped offsite for analysis.

Date	Tasks	Activity
December 16, 2005	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
	Asbestos Abatement	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), John Weinberger (773-419-4585), or Phil Harvey (773-380-9933) for clarification.

Attachment: Site Layout Map



	CABLE SERVICE BOX
	CLEW/OUT
	ELECTRIC SERVICE BOX
	FAUCET
	FIRE HYDRANT
	GAS DROP
	GAS VALVE
	GUTTER/FOOT
	LIGHT STANDARD
	MANHOLE
	SIGN
	SEWER MANHOLE
	OLD IRON PIPE
	OUT WIRE
	PIPE BRIDGE FOUNDATION
	WATER MANHOLE
	SMALL WET PITS IN PROCESS AREA (1-5' DIA.)

DRAWING:
1 of 1

APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 19 – 23, 2005



**CONESTOGA-ROVERS
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MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley DATE: December 30, 2005

C.C.: Sharon Newlon, J. Weinberger, P. Harvey, R. Shepherd, B. Schloessler, Filing

RE: **Weekly Summary Of Site Activities For December 19 - 23, 2005**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the third week (the period December 19 through 23, 2005) is presented below.

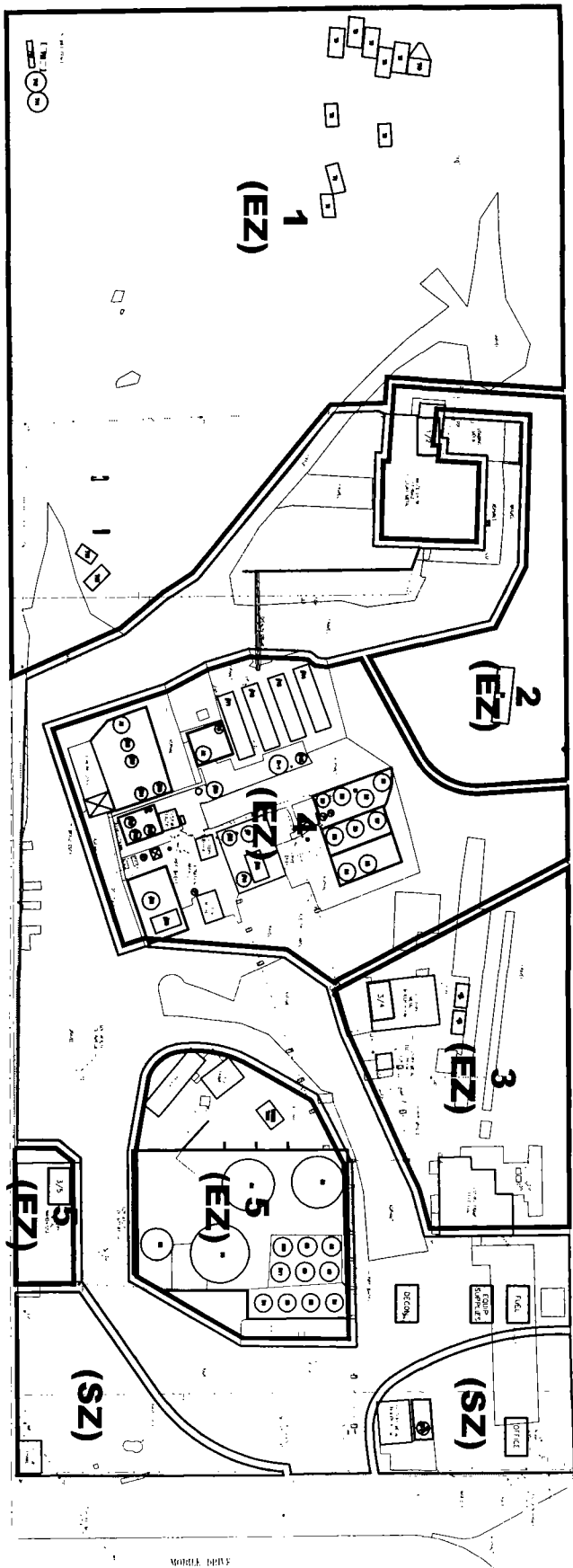
Date	Tasks	Activity
December 19, 2005	Mobilization Activities	No activity
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	Brandenburg Industrial Service Company (BISCo) sheared apart ASTs G3, G4, and B3
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	BISCo removed the pipe bridge between the Areas of EZ 4 and EZ5
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 20, 2005	Mobilization Activities	No activity
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	BISCo also removed AST 46 and AST 47

Date	Tasks	Activity
December 20, 2005	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	BISCo removed the small boiler (likely used oil burner). The used oil inside the burner (approximately 25 gallons) was drained into plastic drums and covered with plastic sheeting. The used oil is pending sampling. The 3-story Fiberglass (plastic) Structure was also demolished
	Soil Sampling/Excavation	No activity
December 21, 2005	Mobilization Activities	No activity
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	BISCo removed and demolished tanks 51, 33, 37, 18, 24, and A2 from Exclusion Zone area EZ 4. EQIS continued sampling solids and sludges from the ASTs identified in the LRA as containing materials
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 22, 2005	Mobilization Activities	No activity
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	BISCo removed and demolished tank the fuel oil tank and tank G2. BISCo also began shearing apart tank # G3. EQIS continued sampling solids and sludges from the ASTs identified in the LRA as containing materials
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	The compressor at the north-central portion of EZ 4 was removed along with the one-story compressor metal compressor building where the unit was housed. The horizontal filtration area at the northeastern portion of EZ 4 was also removed

Date	Tasks	Activity
December 22, 2005	Soil Sampling/Excavation	No activity
December 23, 2005	Mobilization Activities	BISCo performed general clean-up activities. The day was shortened due to the holiday weekend
	Project Coordination	No activity
	AST Sampling/Cleaning Removal	BISCo continued with demolition of tank # G3. EQIS continued sampling solids and sludges from the ASTs identified in the LRA as containing materials. A total of 27 samples were collected and shipped offsite for analysis.
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
	Asbestos Abatement	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), John Weinberger (773-419-4585), or Phil Harvey (773-380-9933) for clarification.

Attachment: Site Layout Map



Brandenburg
Industrial Service Company

WARNING: The information contained in this document may be inaccurate and should be independently verified prior to its use.

[illegible]

Clayton Chemical Site
Saugel, Illinois
Overall Site Plan

CONTAMINATION REDUCTION ZONE
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APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 26 – 28, 2005



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley DATE: December 30, 2005

C.C.: Sharon Newlon, J. Weinberger, P. Harvey, R. Shepherd, B. Schloessler, Filing

RE: **Weekly Summary Of Site Activities For December 26 - 28, 2005**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the fourth week (the period December 26 through 28, 2005) is presented below.

Date	Tasks	Activity
December 26, 2005	Mobilization Activities	Conestoga-Rovers & Associates (CRA) and Brandenburg Industrial Service Company (BISCo) did not mobilize personnel to the Site since BISCo observed Christmas.
	U.S. EPA Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	No activity
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity
December 27, 2005	Mobilization Activities	BISCo performed maintenance on its Liebherr 924 shear
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	One load of scrap steel was released by BISCo to Grossman

Date	Tasks	Activity
December 27, 2005	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	BISCo performed demolition of a compressor, associated tower and pressure tank (west side of site)
	Soil Sampling/Excavation	No activity
December 28, 2005	Mobilization Activities	No activity
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity
	AST Sampling/Cleaning Removal	BISCo performed demolition of AST 53. Three loads of scrap steel were released to Grossman for recycling
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity
	Process Equipment Decommissioning	No activity
	Soil Sampling/Excavation	No activity

If you have any questions about the information provided in this memorandum, please contact me (773-380-9933 or 708-203-8672), John Weinberger (773-419-45850, or Phil Harvey (773-380-9933) for clarification.

Attachment: Site Layout Map

